By relaxing or eliminating these restrictions, the FCC will thereby make it more likely that the resources will be found to deploy the national information infrastructure, and will strengthen that network and the resulting services by ensuring that a wide array of PCS visions -- rural as well as urban -- are applied to delivering advanced wireless services throughout the nation.

Thus the public will benefit from such companies' knowledge and the efficiencies of their networks, and the FCC will foster innovation and competition in wireless services.

Stomp + Retur **Building The** Wireless Future...

April 25, 1994

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W. Room 222 Washington, D.C. 20554

Re:

Ex Parte Filing

GEN Docket No. 90-314

Personal Communications Services

Cellular **Telecommunications** Industry Association 1250 Connecticut Avenue, N.W. Suite 200 Washington, D.C. 20036 202-785-0081 Telephone 202-785-0721 Fax 202-736-3256 Direct Dial

CTIA

Randall S. Coleman Vice President for Regulatory Policy

Dear Mr. Caton:

On Friday, April 22, 1994, the Cellular Telecommunications Industry Association (CTIA), represented by Thomas E. Wheeler and Randall S. Coleman of CTIA, and Philip L. Verveer of Willkie, Farr & Gallagher, met with the Commission's PCS Task Force to discuss issues related to cellular carrier eligibility for personal communications services spectrum. Attending on behalf of the Task Force were Ralph Haller, Julia Kogan, Greg Rosston, Donald Gips, Robert Pepper, Rodney Small, Renee Licht, and Richard Engleman. The views expressed in this meeting, as summarized in the attached presentation materials, reflect CTIA's position as previously filed in this docket.

Pursuant to Section 1.1206(a)(1) of the Commission's Rules, an original and one copy of this letter and the attachment are being filed with your office.

If you have any questions concerning this submission, please contact the undersigned.

Sincerely.

Attachment

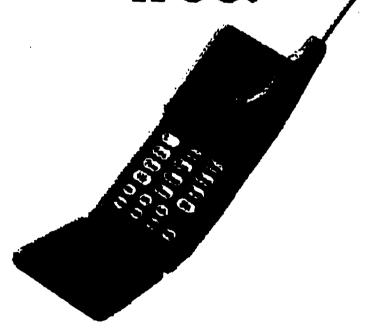
COMPETITION TODAY IN THE ILLINOIS MARKET

CELLULAR
TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

APRIL 21, 1994

FREE AIR TIME

Switch now to **Ameritech** Cellular and get up to 2500 minutes free.



Colleger One every day. And American has better calling quality - even better than Colleger One's new digital system.

An independent engineering study compared Ameritach's current system with Cultular One's digital on the major interstates and downtown and concluded that Americach delivered bottor calling quality by a 2 to 1 margin." With up to 2500 free princetes, up to 25% savings every day, and better calling quality ...

Why wouldn't you switch to Ameritach?



AVAILA TIME AND

1-800-N

Your choice of free phones or free airtime.

Now Cellular One customers have an even bigger reason to switch to Ameritech.

Make the move to Ameritech by April 30 and activation is absolutely free.

And, depending on the service plan you choose, you could get your choice of a free cellular phone. For instance, select Time Pack 150 for 2 years, and upgrade to a Motorola flip phone for free. If you'd like to keep your old phone, you can choose free airtime or big rebates on any cellular equipment, including booster kits, antennas, travel kits or big discounts on cellular service. Best of all, you can mix and match equipment rebates and service discounts to put together the custom cellular package that's just right for you. So make the big switch today, It's easy, It's free. And it's the only way to enjoy better system access and the crystal clear calling quality of Ameritech cellular.

Visit your Ameritach cellular dealer to find out about **from activation** and a great phone deal.

or cell 1-800-MDBULE-1 for the dealer nearest you.





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FREE HANDSET

SUPER CELLULAR SAVINGS FROM AMERITECH



Your choice of free phones or free airtime.

Sign up with Americe's dive, and department on the avents shirt year circure, you can are your critice of a free collular blook. For limitative, says up for two years on filter block 50 and you making for a two bissents Traveler phonon or a Michael block. Chauser Time block 108 for 2 years and you can give a new bissents the phonon. Or channe the reduces on any collular equipments, including launuary lists, assences, travel this could rever, if you want to sign my for Americach traveler and altividy have a picture, you can use your ristore. Or phone expected, could receive my for Americach Could all, you wish with making including open ristores and service directions to out competed a submen cellular package that is lost fulfill for your nevery. And it till conten with the crystal clear calling quality you've cover to expect only than Anterviews.

Volt your America's college desire to find out how to mix and marris year room deal, or call 2-000-00000.5-1 for the desire vegrent year.



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AVAILABLE ONLY AT YOUR AMERITECH DEALER

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1-800-MOBILE-1

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IDE NEEDHAM CHICAGO INC.

AMCCHARTINIA PARTI

"Super Cellular Sevings."

AMERITECH CELLULAR - Civingo
9 3/4" x 12 1/4", b/w., non-bleed, 45 il. screen,
Publication: Talking To The Boss. Du Page Business Ledgur
(Engarver Techtona Israejang)



QUALITY

Demand Detroit's clearest cellular reception.



The other guy's service.



Ameritech's service.

Choose Ameritech and get up to 2,500 bonus minutes.

Once again, Ameritech clearly comes through with the best call quality and the best deal going. A recent independent study proved that Ameritech gives you significantly quieter calls than Cellular One in Detroit. That means when you put the receiver to your ear, there's less static and background noise. And now there's no better time to go with Ameritech. Sign up today and you'll get up to 2.500 bonus minutes." That's a servings of up to \$625 for the clearest, quietest cellular service in town. So call Ameritech today!



Offer extended! Call 1-800-MOBILE-I today.

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Choose Detroit's clearest cellular reception.



The other guys



Now get up to 2,500 free minutes.

Once again, Ameritech clearly comes through with the best call quality and the best deal going. A recent independent study proved that Ameritech gives you significantly quieter calls than Cellular One in Detroit. That means, when you put the receiver to your ear, there's less static and background noise. And now there's no better time to go with Ameritech. Sign up today and you'll get up to 2,500 minutes absolutely free." That's a servings of up to \$625 for the clearest, quictest cellular service in town. So call Ameritech today!



Call 1-800-MOBILE-1 today



ROAMING RATES

Still confused about which cellular service is best?

When Roaming in:	Call Length	Ameritech's Cost	Cellular One's Cost		
Columbus	2 min.	\$1.00	\$4.00		
Detroit	3 min.	1.50	2.97		
Indianapolis	4 min.	2.00	6.40		
Madison	5 min.	2.50	4.95		

^{*}Price shown does not include Cellular One's automatic monthly fee of \$2.00 when you roam.

Introducing Roam Ameritech

If you rely on your cellular phone when you travel, Ameritech has good news. Starting February 27, our new simplified roaming rate structure makes it easier and more affordable to make calls while traveling in selected cellular service areas.

We've reduced roaming rates by an average

of 33%, and eliminated the daily surcharge entirely. Roam Ameritech is available to all Ameritech cellular service customers at no extra charge. There's no additional monthly fee, no matter how much you roam.

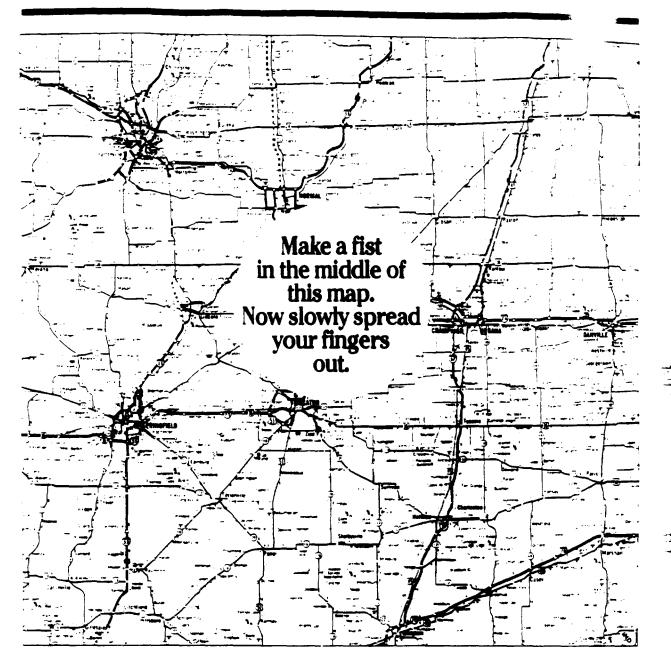
Roum Ameritech. Simply the best rouning rates available. Nothing confusing about that.

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COVERAGE



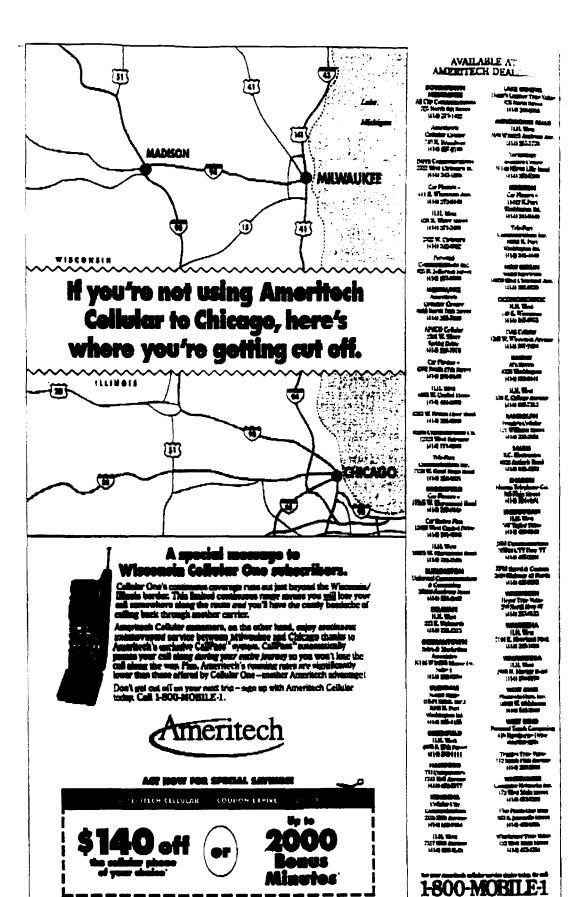
Thank you for demonstrating Ameritech Mobile's expanding coverage in Central Illinois.

(And remember, you receive affordable home rates with no daily access fee no matter where you travel in our Central Illinois region.)

Call 1-800-MOBILE-1 or the Ameritech Mobile Authorized Dealer near you:

Consolidated Communications General Offices 900-637-5328 Consolidated Communications Charleston 638 W Lincoln 217-345-9300 Consolidated Communications Valtoon Cross County Mali 217-235-9300

AMERITECH MOBILE COMMUNICATIONS



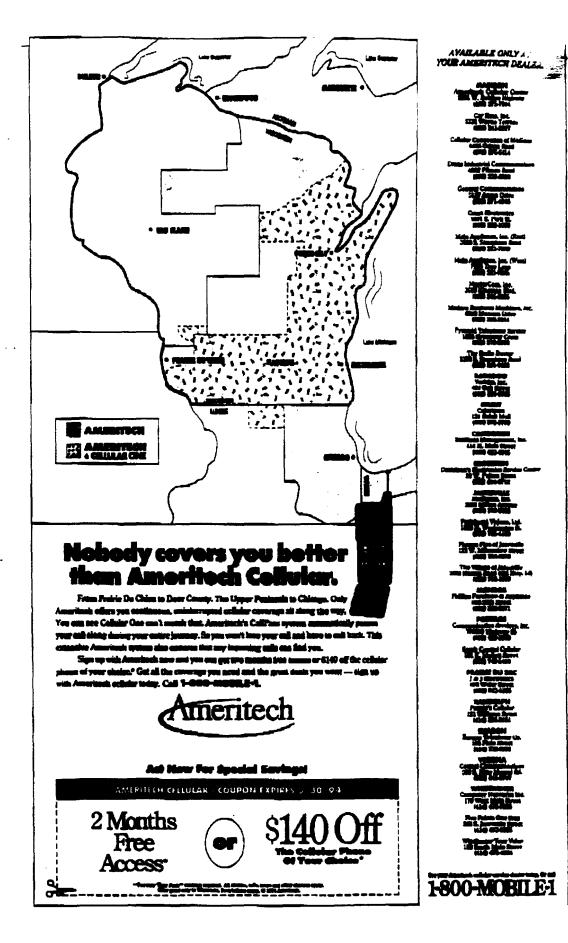
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RATE COMPETITION

Which cellular service is the best deal?

You make the call.

MONJES USAFÉ	AMERITECH	ELLEAR GOA	alis TANDAGA Aliferte Est	
50 min.	TIME PACK 50 \$25.06 per conth	Call Pack 50 \$31.00 per umak	\$71.04	
275 min.	TIME PACK 275 \$76.50 per week	Call Pack 100 \$59.85 per mode	\$280.20	
\$26 min.	10M2 MCK 820 \$192.57 per meats	Call Pack 500 \$240.41 ps mask	\$874.06	

Facts are facts. The chart ove proves it. Ameritech is per than Cellular Onc. Not just a little cheaper. A lot cheaper - no matter how many minutes of airtime you're comparing. As the last column on the right shows, those savings can add up to hundreds of dollars a year.

And the value Ameritach offers down't stop there. Sign up for one year on an approved service plan with Ameritech" and you're automatically enrolled in the Ameritech MVP Program which entitles you to free activa-

tion, free phone repair and more. So you see, there really is no comparison between Cellular One and Ameritech. To make the call even easier, not to mention cheaper, you'll also receive \$150 of airtime credit if you sign up before April 30.



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It's not the price of the cellular phone.

It's the price of the cellular service.

AMONGO STATES ST		•• j. j. s. e.	ren era Otas		natural averyog Armana Media	
50 min.	Time Pack** 50	\$25.08	Cell Pack 50	\$31.00	\$71.04	
150 min.	Time Pack** 150	\$50.15	Call Pack 100	\$62.10	\$143.40	
450 min.	Time Pack = 450	\$112.20	Call Pack 300	\$147.07	\$418.44	

You're smart enough to know there's no such thing as a free lunch. So when someone offers you a "free" cellular phone, somewhere along the line, you're going to pay for it. And pay for it. Usually in the form of higher service charges. That's why it's important to compare service charges, before you buy. Americach saves you money on service costs, month after month, year after year.

And while Ameritech's service costs you less, it doesn't give you less. When you sign up for at least one year on an approved service plan, you automatically become a member of the Ameritech MVP" program, with exclusive benefits such as locked-in calling rates, free custom calling and stolen phone replacement.

To make the comparison even easier, Ameritech will give you a \$150 service credit on airtime if you sign up for Ameritech cellular service by April 30. And if you're a business customer, be sure to ask about our special discounts for high-volume callers. No matter how you look at it, Ameritech is Chicagoland's best cellular value.

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1-800-MOBILE-1

DOS MERCHANI WORLDWICE, CHICAGO

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American Mahillo Communications

Here's what you get in a \$24.95 cellular service plan.

More or less.

AMERITECH	по чады))
Basic Monthly Access	Basic Monthly Access
15 Free minutes per month	
Free activation (\$35 value)	
Locked-in calling rates	
Free emergency loaner phone	
Stolen equipment replacement program	
Free phone repair	

The best way to determine who gives you the best value in cellular service is to compare plans. So let's compare.

What does a \$24.95 plan from Cellular One get you? Well, we're not sure what it gets you apart from a monthly

bill, With Ameritech, however, \$24.95 entitles you to 15 free sixtime minutes, plus you automatically get the benefits of the Ameritech MVP Program". like free activation, free phone repair and more. Sign up for cellular service from Ameritech

before April 30, and receive an additional \$150 airtime credit.

So if you want the best value in cellular service, compare what Ameritech and Cellular One offer. You'll discover there is so comparison.

AMERITECH.

Your Link To A Better Life"

August enrhaps in based on published spart as of 1/1/13. Assertants costs reflect a discussit for receptor reinsours serus commissions. There is a \$150 possibly for purply discussives. Clearly one costs reflect a 20/min. Intercentant for Assertant MVP Program". Callebr One costs reflect a 20/min. Intercentant for for every naisest gasts. Other reservations may apply. OTHE Assertants, inc., All rights reperved. Callebr One is a registered service parts of the Callebr One Group.

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Central States
Communications
1001 E. Grove
309/663-2532 *****

Hill Radio 2503 G.E. Road 309/663-2141 *****

> Mobile Audio 1404 Kurt Drive 309/454-1515

El Paso

Gemceli Inc. 48 W. First Street 309/527-4100

GridleyGridley Cellular OS E. Third Street

106 E. Third Street 309/747-3400

Pairbury

Pairbury Auto Parts 210 W. Locust 815/692-4621

Lincols

P & M Communications 390 S. Limit 217/732-3331

Havapa

The Cellular Connection Dorchester Estates 1-800/475-7025

Gibson City

Hood's Ace Hardware 119 N. Sangamon 217/784-4273

AMERITECH MOBILE. WE MAKE IT EASY.



Switch to the Ameritech Mobile Safe and Sound Plan. The security of a mobile phone, at our best price ever.

If you currently have a moone phone security plan at a price you don't feel secure about, now's a good time to switch. Get the best price in town, plus FREE activation (\$35 value). Call today.

1-800-MOBILE-1

Ask for Operator 3 or call your participating distributor.

MADISON Cellular Connection (608)276-6414

Evans Industrial Communications (608)222-8500

General Communications (608)271-4648

Grant Electronics (606)282-1000

Main Appliance (608)221-7865 (608)221-7860

Pyramid Telephone (608)273-9300

Radio Specialty Company (608)255-7392

DEPOREST Access Communications (508)846-4363 JAMESVILLE Blackhawk Telecommunications (608)752-2021

Mulligans, Inc (608)755-0666

Phones Plus of Janesville (608)756-8800

Thompson Electronics (606)754-2858

SELOIT Computer Business Services (608)364-1012

PORTAGE Communications Service, Inc. (608)429-3300

Gaffney Electric (608)253-3371

South Central Cellular (608)742-5400

PRAIRIE DU SAC J & J Electronics (508)643-4866

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COMPETITION TODAY IN THE DALLAS MARKET

CELLULAR
TELECOMMUNICATIONS
INDUSTRY ASSOCIATION

APRIL 21, 1994

DALLAS, IX: COMPETING DOWN TO LANDLINE LEVELS

Given the Texas economy's steady growth, positive NAFTA benefits and the state's general infatuation with the automobile, it's no surprise the battle to sell wireless telecom to Dallas/Ft. Worth's 4.3 mil. pops is fierce.

Especially when industry heavyweights SW Bell and LIN/McCaw are in the

face-off. So far, wheeline SW Bell holds the lead with a 60/40 subsplit, fueled by its 11-year local cellular presence (vs. LIN's eight yrs.), brand-name recognition and strong distribution system.

SW Bell's ace has been its aggressive pricing strategies which have forced LIN (operating under the name Metrocel) to respond with

Service Plan	Monthly Tharge							
SW Bell								
Association II *	\$39.95	\$0.32	\$0.07	\$0.07	Э	600	100	\$0.06
Basic	49.95	3.40	0.07	0.37	3	400	100	0.10
Freedom	59.00	3.32	0.17	0.17	150	200	50	0.15
Executive Metrocel	99.00	3.27	0.12	0.12	300	350	50	0.14
Association II *	\$39.99	\$0.35	\$0.07	n/a	٥	50 0	n/a	\$0.08
Freedom	49.99	0.30	0.15	n/a	12	20	n/a	0.42
Freedom II	57.99	0.32	0.17	n/ a	120	250	n/a	0.16
Time Manager 99	99.99	0.28	0.10	n/ a	35	50	n/ a	C.29
All plans requir			ntract	c avca	n= (+)	ubich	×0.0711	res

lower prices for hardware and airtime. The table above shows representative

rate plans, detailing the large number of free minutes, especially off-peak, in bundled packages. Rates like these start to give landlines (avg. rate 5¢ per local/long distance min.) a run for their money.

When rates are competitive and phones prices drop to \$1 or less, how do companies compete? By increasing coverage footprint, upgrading technology and strengthening distribution.

Metrocel grew its footprint by 66% in Jan., expanding southward to include Austin and covering 30K sq. miles vs. 18K earlier. SW Bell increased its area, too, adding Oklahoma City and covering 37K sq. miles. Both offer home-rate roaming in expanded areas and special longdistance rates.

LIN/McCaw upgraded to an Ericsson system this month, giving it a digital platform for its 176 Dallas-area cell sites. SW Bell already markets digital, offering up to a 10% discount to nearly 15,000 digital subs, 90% in the Dallas metro. This notice appears as a matter of record only.

October 1993

Lin Cellular Communications Corp.

Has acquired the non-wireline cellular operations in

Texas 17 RSA

Serving 10 counties in East Texas.

from

Eastex Cellular L.P. D. Altos Corp. G.P.

Serving a population of 225,000.

We represented the seller.



3200 Cherry Creek South Drive, Suite 500, Denver, CO 80209 303/778-5555 299 Park Avenue, New York, NY 10171

Financial Services to the Mobile Communications Industry.

CELLULAR ASKS FOR NEW SPECTRUM TO EXPAND WIRELESS SERVICES

WASHINGTON, D.C. -- The cellular telecommunications industry will ask the Federal Communications Commission (FCC) to make available to it and to others additional radio spectrum for the provision of expanded wireless communications services.

In comments to be filed Nov. 9 in the FCC's "Personal Communications Services" rule-making, the cellular industry will suggest this new spectrum be allocated to five licensees in each of the market areas used to define cellular service.

The FCC's PCS proceeding is expected to expand the provision of wireless telecommunications to include new services and new providers.

"We realize the fact that new entrants will be competing for the wireless consumer," commented Thomas E. Wheeler, President and CEO of the Cellular Telecommunications Industry Association. "We're asking the FCC to let us compete as well by allowing cellular carriers access to the new spectrum."

Under the FCC rule-making, companies ranging from MCI to Time-Warner and cable television operators plan to expand beyond their existing communications services into services offered over the new spectrum.

"Cellular operators are asking the FCC for the same growth opportunity that will be made available to other communications companies," Wheeler said. "The cellular industry has built a high-risk venture into the world's finest wireless system. In so doing, it has opened the doors to a future in which it has earned the right to participate."